

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JAMES GH AISAR et al.,

Plaintiffs,

v.

Alejandro Amaya, et al.,

Defendants.

Civil Action No. 1:18-cv-1296 (CMH/IDD)

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND
MEMORANDUM OF LAW IN SUPPORT**

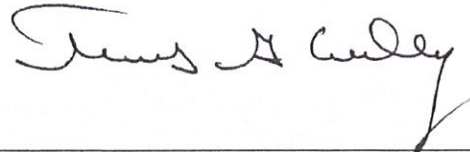
Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiffs James Ghaisar and Kelara Ghaisar, Defendant Alejandro Amaya, and Defendant Lucas Vinyard, by their counsel, respectfully request that the Court enter the Stipulated Protective Order attached hereto as Exhibit 1. In support of their Joint Motion, Plaintiffs and Defendants provide the following:

1. Pursuant to Rule 26(c)(2) of the Federal Rules of Civil Procedure, “a party or any person from whom discovery is sought may move for a protective order in the court where the action is pending . . .”
2. Plaintiffs and Defendants, by counsel, have conferred and agreed to the terms of a Stipulated Protective Order governing the parties’ treatment of discovery obtained from non-parties to this action.
3. An endorsed copy of the Stipulated Protective Order is attached hereto as Exhibit 1.
4. Because the parties are jointly moving for the entry of the attached Stipulated Protective Order, a hearing is waived, and the parties therefore have not set this Motion for hearing.

Plaintiffs and Defendants therefore respectfully request that this Court grant their Motion and enter the Stipulated Protective Order into the record for this case.

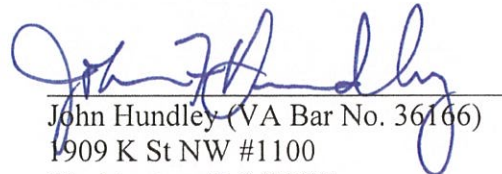
Dated: September 13, 2019

Respectfully submitted,



Thomas G. Connolly (VA Bar No. 29164)
Roy L. Austin, Jr. (appearing *pro hac vice*)
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street NW, 8th Floor
Washington, D.C. 20036
Telephone: 202-730-1300
tconnolly@hwglaw.com
raustin@hwglaw.com

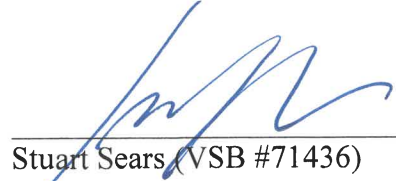
Counsel for Plaintiffs



John Hundley (VA Bar No. 36166)
1909 K St NW #1100
Washington, DC 20005
Telephone: 202-661-2212
hundleyj@ballardspahr.com

Kobie Flowers
Brown Goldstein Levy, LLP
1717 K Street, NW, Suite 900
Washington, DC 20006
Telephone: 202-742-5969
kflowers@browngold.com

Counsel for Defendant Alejandro Amaya



Stuart Sears (VSB #71436)
Schertler & Onorato, LLP
901 New York Avenue, NW, Suite 500
Washington, D.C. 20001
Telephone: 202-628-4199
ssears@schertlerlaw.com

Counsel for Defendant Lucas Vinyard